From Rick Breitenbach —
Comments on Draft Affected Env'l Impact Assessment Reports

Comments on all Reports 6/2/97

1. Significance Criteria may vary for all resources being considered but, we need a standard opening for each which leads into the variations. Copies of our draft significance criteria report should be provided to all teams. I think the wildlife report has a good example of an intro as well as how to identify thresholds and then the criteria. We probably are not going to be able to get to a level of detail that allows us to identify exceedance of the significance threshold in any resource area. Rather, we need to think in terms of potential exceedance and this would probably occur in most areas unless we have clear idea that there would be no impact.

2. Avoid identification of specific islands or locations in discussion of impacts. While they may show up in alternative descriptions, they are there as examples. You could use the island or area as an example. Need to preface your discussion so that reader knows you'll be using examples. See # 10. Also, avoid using specific acreages. We don't know what will eventually come or exactly where it will be. Specific islands/locations and numbers gives reader a sense we know a whole lot more than we do. The GIS work may be a handy way to describe impacts but if the results are presented directly from the map they are far to specific for our needs.

3. Opening paragraph for all Affected Environment and Impact Analysis reports should be the same. Ray and Frank see my mark-up of Land Use in Economic packet for Affected Environment and the Recreation packet for impact analysis and make sure they are retyped and given to all team leaders. This should then be followed by general focus of section as well as other general overview information about the resource.

4. The study area description in Affected Environment reports should generally be consistent across resource descriptions. See Water Quality Affected Environment @ 2.1. Similarly, the regulatory context needs to be consistent, where appropriate, across resource reports. Frank and Ray will gather up all the regulatory contexts and sort through them to find the best descriptions. Then get those back out to the teams so that teams using same regs are using same description.

5. Need to make a special effort to ensure descriptions of resource categories found in the text of a different resource category are consistent with their respective reports, e.g., the Land Use Affected Environment report covers Agriculture land use and agricultural land use is also covered in the Agricultural Economics report. We should be consistent about what we say in both places. This will be the work of an editor but, the Frank and Ray will layout the ground rules.

6. Tables prepared to array historical and existing information should strive to use a range of year types, e.g., 1950-60-70 rather than 57-58-73 or 50, 51, 52, 53, 54, 55,... 69, 70. If 57,58 or 73 is all we have, we need to make that clear to the reader. The section entitled Sources of Information in the Affected Environment reports may do that but, the reader will probably forget and should be reminded in the discussion covering the information in the table or figure.

7. The Affected Environment is at the 1995 level of development not 1990.

8. There should be no discussion of impacts or areas potentially affected in the description of the Affected Environment.

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9. Any discussion of the alternatives or its components should be extremely abbreviated if used at all when discussing impacts. My preference is that alternatives should not be discussed as reader knows where alt description can be found.

10. The reports about reservoirs were provided to the reviewers as examples of what a reservoir upstream of the Delta might create/impact. We do not know where a reservoir might be built nor

what the impacts will really be until a site is eventually selected in Phase 3. Accordingly, when discussing impacts you should not focus on the specific reservoirs but rather a generic reservoir and offer information from the example reservoirs to give the reader a sense of the potential impacts, e.g., surface water storage in the sac valley could result in a variety of terrestrial impacts. Using existing information about AA reservoir as an example of what might occur when surface storage is built, we found that H to I acres of ---, ----, and --- habitats could be affected and those habitat types support the following species. The data is about 5-10 years old so it is likely that there may be some different information to be gathered when and if this site is selected for phase 3. Also, looking at recent Fish and Game and FWS records, the following special status spp. may occur within that county(s). Reservoir BB has the same types of habitats plus ---. This habitat is very unique. Species are quite similar except for --, and ---, etc. Similarly, special status spp are similar except for ---,---, etc.

11. To minimize repetition, the consequences need only be stated once where they are the same. Reader should be informed of this approach.

12. When writing the technical appendix, your writeup should reflect that this is the final not some intermediary stage to the final. If you don't have data at this time that is ok. List outline headings and indicate more to come where appropriate rather than leaving it out. When the technical appendices are complete, they will consist of the affected environment description and the impact analysis description. So, you don't need to put affected environment stuff in impact analysis.

13. The outlines were set up to ensure all documents were prepared similarly, they need to be used. On the basis of what we've seen in these prelim drafts, there are different interpretations of what we are requesting in the impact analysis outline. Frank and Ray will make a few adjustments and get an annotated outline back to you. ultimately, we are looking for the following in all the resource category documents:

- a description of affected environment conditions (existing conditions) by region;
- a description of the no action alternative future conditions by region; the conditions stem from projections forward from the affected environment. in many cases they will be the same as described for the affected environment.
- a description of the alternative future conditions by region; these also stem from projections forward from the affected environment. in many case, the conditions will be similar among variations of a given alternative as well as across alternatives.
- a comparison of affected environment conditions to no action alt. future conditions, by region, to describe what may happen in the future if the project isn't built. hopefully a table with some related narrative;
- a comparison of each of the alternative future conditions to the no action future conditions, by region, to describe the difference between w/ and w/o the project futures. hopefully a table with some related narrative; and lastly
- a comparison of affected environment conditions to each of the alternative future conditions, by region, to describe how the alternatives will alter the current conditions. hopefully a table with some related narrative.

14. Related consequences. Each report needs to give the reader a sense of where they can find related information. A couple of really keen points right now are the 3rd party impacts related to water transfers and groundwater pumping. I imagine there are others. Somewhere in each impact analysis report, there needs to be a section that discusses related consequences. They also

need to be mentioned in the overall summary of impacts section. See 3.5 Land Use impact section as a start.

15. Need to take care in reading the alternatives and subsequently attributing impacts to them. Storage in Delta is a good example of something that seems to show up in a description of consequences for an alternative that doesn't have storage in the Delta. If there are questions, need to talk with Loren.

16. Many questions identified in text. Need to reach across the teams and asked these questions rather than putting them in the text. You need to take the steps to get the answers. Env. Team will help.